

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF TEXAS  
DALLAS DIVISION

UNITED STATES OF AMERICA

v.

JOSHUA SEEKINS

NO. 3:19-CR-563-M

**MOTION FOR DETENTION**

The United States moves for pretrial detention of defendant, Joshua Seekins, pursuant to 18 U.S.C. §3142(e) and (f).

1. Eligibility of Case. This case is eligible for a detention order because the case involves (check all that apply):

☒ Crime of violence (18 U.S.C. §3156);

☐ Maximum sentence life imprisonment or death

☐ 10 + year drug offense

☐ Felony, with two prior convictions in above categories

☒ Serious risk defendant will flee

☐ Serious risk obstruction of justice

☐ Felony involving a minor victim

☐ Felony involving a firearm, destructive device, or any other  
dangerous weapon

☐ Felony involving a failure to register (18 U.S.C. § 2250)

2. Reason for Detention. The Court should detain defendant because there are no conditions of release which will reasonably assure (check one or both):

  X   Defendant's appearance as required

  X   Safety of any other person and the community

3. Rebuttable Presumption. The United States will/will not invoke the rebuttable presumption against defendant because (check one or both):

       Probable cause to believe defendant committed 10+ year drug offense or firearms offense, 18 U.S.C. §924(c)

       Probable cause to believe defendant committed a federal crime of terrorism, 18 U.S.C. §2332b(g)(5)

       Probable cause to believe defendant committed an offense involving a minor, 18 U.S.C. §§1201, 2251

       Previous conviction for "eligible" offense committed while on pretrial bond

4. Time For Detention Hearing. The United States requests the Court conduct the detention hearing,

       At first appearance

  x   After continuance of   3   day (not more than 3).

DATED this 5th day of December, 2019.

Respectfully submitted,

ERIN NEALY COX  
UNITED STATES ATTORNEY  
NORTHERN DISTRICT OF TEXAS

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**CERTIFICATE OF SERVICE**

I hereby certify that on the 5th day of December, 2019, I filed this motion with the United States District Clerk for the Northern District of Texas and a copy will be electronically served on the attorney of record in accordance with the Federal Rules of Criminal Procedure.

/s/ Shane Read

SHANE READ

Assistant United States Attorney